

HAROLD G. HOPPE 5049
Pacific Guardian Center, Makai Tower
733 Bishop Street, Suite 2300
Honolulu, HI 96813
Telephone: (808) 528-1903
Facsimile: (808) 531-3860

JOHN R. HILLSMAN 71220
McGuinn, Hillsman & Palefsky
535 Pacific Avenue
San Francisco, CA 94133
Telephone: (415) 421-9292
Facsimile: (415) 403-0202

Attorneys for Dennis Claypool,
Sheryl Claypool, Scott Claypool and Kristen Claypool

UNITED STATES DISTRICT COURT

DISTRICT OF HAWAII

DENNIS CLAYPOOL, individually)	Civil No. CV04 00570 HG- BMK
and as Guardian Ad Litem for)	
KRISTEN CLAYPOOL, a minor,)	
SHERYL CLAYPOOL, SCOTT)	
CLAYPOOL, and KRISTEN)	DECLARATION OF JODIE
CLAYPOOL,)	JEFFERY
Plaintiffs,)	
vs.)	
)	
CAPTAIN ANDY'S SAILING, INC.,)	
BLUE DOLPHIN CHARTERS, LTD.)	
and BLUE DOLPHIN DIVING,)	
INC.,)	
Defendants.)	
)	

MATTHEW ISHAM, individually) CIVIL NO. CV04-00559 HG-BMK
and as Guardian ad Litem for)
HAYDEN ISHAM, a minor;)
ROXANNE BEST ISHAM,)
)
Plaintiffs,)
vs.)
)
BLUE DOLPHIN CHARTERS,)
LTD. and BLUE DOLPHIN)
DIVING, LTD., CAPTAIN)
ANDY'S SAILING, INC.,)
)
Defendants.)

IN THE MATTER OF THE) Civil No. CV05-00037 HG BMK
COMPLAINT OF BLUE DOLPHIN)
CHARTERS, LTD. AND TERRY)
DONNELLY, AS OWNERS OF)
THE VESSEL M/V BLUE)
DOLPHIN, O/N 1082212, FOR)
EXONORATION FROM AND/OR)
LIMITATION OF LIABILITY)

I, JODIE JEFFERY, hereby state and affirm that:

1. I am an adult resident of the State of Arizona. I have been a personal friend of Dennis Claypool for about 5 years. We also attend the same church. I

have worked as a registered dietician for many years. I also took care of my ailing veteran father in the later portion of his life. Because of these experiences, I am very familiar with the way patients and people show and try to hide pain.

2. Before his July 20, 2004 accident, Dennis was a very robust, capable, outgoing person. He was also very handy. He helped fix and build many things around my house. He remodeled my backyard, maintained my plumbing, and assisted with several electrical projects. Dennis also used to provide many valuable services to our church and its congregation. Among other things, I often saw him set up chairs for services and set up the Christmas tree for the winter holidays. Since the accident, he is no longer capable of providing this help. Since the accident, he hasn't been able to do any of these things. It is easy to see how much this inability pains him.

3. I helped home nurse Dennis immediately after his second surgery. I have also seen him in a variety of church and social settings since the accident. It is obvious to me that he still suffers a good deal of chronic pain and daily inconvenience because of his injuries. It is also obvious to me that he does everything he can to shield that pain from others, and to downplay that inconvenience whenever he can. I believe Dennis based a good deal of his self-image and self-esteem on his widely acknowledged handiness and helpfulness before this accident. I think the loss of those attributes has cost him more than any

of us will ever know. Dennis was, and is, a great and good man, and it pains me to see him in this kind of distress.

I have reviewed the foregoing declaration, and can confirm under penalty of perjury under the laws of the State of Hawaii that the facts and opinions contained therein are true and correct, and personally known to me, and that if I were called as a witness herein, I could competently so testify under oath.

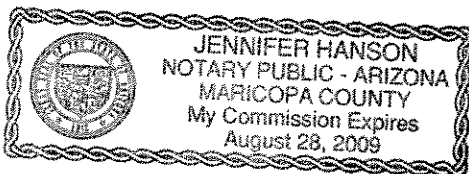
Executed on this 3 day of April, 2006, in the City of Mesa, State of Arizona.

Jodie Jeffery
JODIE JEFFERY

State of Arizona }
County of Maricopa } ss

On 4-3-2006 before me, Jennifer Hanson,

personally appeared Jodie Jeffery, personally known to me or proved to me on the basis of satisfactory evidence to be the person whose name is subscribed to the within instrument and acknowledged to me that he executed the same in his authorized capacity, and that by his signature on the instrument the person executed the instrument.



WITNESS my hand and official seal.

Jennifer Hanson
Signature of Notary Public